

The Honorable David W. Christel

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,
Plaintiff,
v.
JOAO RICARDO DEBORBA,
Defendant.

NO. *MJ22-5067*

COMPLAINT FOR VIOLATION

Title 18, United States Code, Section
922(g)(5)

Title 18, United States Code, Section
922(g)(8)

Before David W. Christel, United States Magistrate Judge, U.S. Courthouse,
Tacoma, Washington.

The undersigned complainant being duly sworn states:

COUNT 1

(Unlawful Possession of a Firearm)

From on or about March 23, 2019, to on or about November 16, 2019, in
Clackamas County, in the District of Oregon, and Clark County, within the Western
District of Washington, and elsewhere, JOAO RICARDO DEBORBA, knowing he was
an alien illegally and unlawfully in the United States and admitted to the United States
under a nonimmigrant visa, did knowingly possess, in and affecting interstate and foreign
commerce, a firearm, that is, a Savage Arms model M11 .308 caliber rifle, bearing serial

1 number K324833, that had been shipped or transported in interstate and foreign
2 commerce.

3 All in violation of Title 18, United States Code, Section 922(g)(5).

4 **COUNT 2**

5 **(Unlawful Possession of a Firearm)**

6 From on or about April 4, 2019, to on or about November 16, 2019, in Thurston
7 County and Clark County, within the Western District of Washington, and elsewhere,
8 JOAO RICARDO DEBORBA, knowing he was an alien illegally and unlawfully in the
9 United States and admitted to the United States under a nonimmigrant visa, did
10 knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is, a
11 Sig Sauer model 1911 STX .45 auto caliber handgun, bearing serial number 54E026501,
12 that had been shipped or transported in interstate and foreign commerce.

13 All in violation of Title 18, United States Code, Section 922(g)(5).

14 **COUNT 3**

15 **(Unlawful Possession of a Firearm)**

16 From on or about April 13, 2019, to on or about November 16, 2019, in
17 Multnomah County, in the District of Oregon, and Clark County, within the Western
18 District of Washington, and elsewhere, JOAO RICARDO DEBORBA, knowing he was
19 an alien illegally and unlawfully in the United States and admitted to the United States
20 under a nonimmigrant visa, did knowingly possess, in and affecting interstate and foreign
21 commerce, a firearm, that is, a KelTec model Sub-2000 .40 caliber rifle, bearing serial
22 number FF4Q08, that had been shipped or transported in interstate and foreign
23 commerce.

24 All in violation of Title 18, United States Code, Section 922(g)(5).

25 **COUNT 4**

26 **(Unlawful Possession of a Firearm)**

27 On or about April 14 2019, in Clark County, within the Western District of
28 Washington, JOAO RICARDO DEBORBA, knowing he was an alien illegally and

1 unlawfully in the United States and admitted to the United States under a nonimmigrant
 2 visa, did knowingly possess, in and affecting interstate and foreign commerce, a firearm,
 3 that is, a Glock model 26 9mm caliber handgun, bearing serial number BGBU719, that
 4 had been shipped or transported in interstate and foreign commerce.

5 All in violation of Title 18, United States Code, Section 922(g)(5).

6 **COUNT 5**

7 **(Unlawful Possession of a Firearm)**

8 From on or about April 20, 2019, to on or about November 16, 2019, in
 9 Multnomah County, in the District of Oregon, and Clark County, within the Western
 10 District of Washington, and elsewhere, JOAO RICARDO DEBORBA, knowing he was
 11 an alien illegally and unlawfully in the United States and admitted to the United States
 12 under a nonimmigrant visa, did knowingly possess, in and affecting interstate and foreign
 13 commerce, a firearm, that is, a Century Arms model RAS47 7.62 caliber rifle, bearing
 14 serial number RAS47071128, that had been shipped or transported in interstate and
 15 foreign commerce.

16 All in violation of Title 18, United States Code, Section 922(g)(5).

17 **COUNT 6**

18 **(Unlawful Possession of a Firearm)**

19 From on or about May 8, 2019, to on or about November 16, 2019, in Clark
 20 County, within the Western District of Washington, and elsewhere, JOAO RICARDO
 21 DEBORBA, knowing he was an alien illegally and unlawfully in the United States and
 22 admitted to the United States under a nonimmigrant visa, did knowingly possess, in and
 23 affecting interstate and foreign commerce, a firearm, that is, a Rock Island Armory model
 24 M200 .38 special caliber handgun, bearing serial number RIA1999506, that had been
 25 shipped or transported in interstate and foreign commerce.

26 All in violation of Title 18, United States Code, Section 922(g)(5).

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COUNT 7**(Unlawful Possession of a Firearm)**

On or about November 16, 2019, in Clark County, within the Western District of Washington, JOAO RICARDO DEBORBA, knowing he was an alien illegally and unlawfully in the United States and admitted to the United States under a nonimmigrant visa, and knowing that he was subject to a court order issued on or about November 14, 2019, in the District Court of the State of Washington, County of Clark, case number 9Z1074494, which was issued after a hearing of when he received notice and at which he had an opportunity to participate, restraining him from harassing, stalking, or threatening an intimate partner, that by its terms explicitly prohibited the use, attempted use or threatened use of physical force against such intimate partner that would reasonably be expected to cause bodily injury, did knowingly possess, in and affecting interstate and foreign commerce, the following firearms:

a Savage Arms model M11 .308 caliber rifle, bearing serial number K324833

a Sig Sauer model 1911 STX .45 auto caliber handgun, bearing serial number 54E026501

a KelTec model Sub-2000 .40 caliber rifle, bearing serial number FF4Q08

a Century Arms model RAS47 7.62 caliber rifle, bearing serial number RAS47071128

a Rock Island Armory model M200 .38 special caliber handgun, bearing serial number RIA1999506

All in violation of Title 18, United States Code, Sections 922(g)(5), (8).

COUNT 8**(Unlawful Possession of a Firearm)**

On or about May 6, 2022, in Clark County, within the Western District of Washington, JOAO RICARDO DEBORBA, knowing he was an alien illegally and unlawfully in the United States and admitted to the United States under a nonimmigrant visa, and knowing that he was subject to a court order issued on or about October 14,

2020, in the Superior Court of the State of Washington, County of Clark, case number 2020-1-01294-06, which was issued after a hearing of when he received notice and at which he had an opportunity to participate, restraining him from harassing, stalking, or threatening an intimate partner, that by its terms explicitly prohibited the use, attempted use or threatened use of physical force against such intimate partner that would reasonably be expected to cause bodily injury, and knowing that he had been convicted of at least one of the following a misdemeanor crimes of domestic violence, namely, Assault in the Fourth Degree – Domestic Violence, in the Superior Court of the State of Washington, County of Clark, under case number 2020-1-01294-06, on or about October 14, 2020, and Assault in the Fourth Degree – Domestic Violence, in the Superior Court of the State of Washington, County of Clark, under case number 21-1-01539-06, on or about January 31, 2022, did knowingly possess, in and affecting interstate and foreign commerce, the following firearms:

two AR-15-type rifles, bearing no serial number or manufacturer's marks;
 an AR-15-type rifle with an attached bipod, bearing no serial number or manufacturer's marks;
 a Ruger model LCP 9mm caliber handgun, bearing serial number 371726823;
 a Glock-type 9mm caliber handgun, bearing no serial number or manufacturer's mark.

All in violation of Title 18, United States Code, Sections 922(g)(5), (8), (9).

And the complainant states that this Complaint is based on the following information:

I, Jordan Vossler, being first duly sworn on oath, depose and say:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a Deportation Officer with the U.S. Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO) and have been since September 2015. I have been employed by the Department of Homeland Security for

1 approximately 11 years and am currently stationed in Portland, Oregon. I previously
2 served as an Immigration Enforcement Agent from February 2011 to September 2015. I
3 am currently assigned to the Criminal Alien Program (CAP) where I am responsible for
4 conducting administrative and criminal investigations into possible violations of the
5 federal law with an emphasis on immigration law. I am also collaterally assigned to the
6 Federal Bureau of Investigations (FBI) Safe Streets Task Force in Vancouver,
7 Washington where I am responsible for conducting criminal investigations involving, but
8 not limited to, violent crimes, firearm offenses, transnational gangs and narcotics
9 trafficking. As part of this assignment, I have received Special Deputation with the
10 Department of Justice as an FBI Task Force Officer. My training and experience include
11 graduating the ICE DRO Basic Immigration Enforcement Academy in 2011, completing
12 the ICE Field Operations Training Program in 2015, and completing the Field Operations
13 Training Program-Prosecutions Module in 2019 at the Federal Law Enforcement
14 Training Centers in Glynnco, Georgia and Charleston, South Carolina. I have also assisted
15 with the service of multiple search warrants with state and local law enforcement
16 agencies as well as with the FBI, Drug Enforcement Administration (DEA), and Bureau
17 of Alcohol Tobacco, Firearms, and Explosives (ATF).

18 2. The facts set forth in this Affidavit are based on my own personal
19 knowledge; knowledge obtained from other individuals during my participation in this
20 investigation, including other law enforcement personnel; review of documents and
21 records related to this investigation; communications with others who have personal
22 knowledge of the events and circumstances described herein; and information gained
23 through my training and experience. Because this Affidavit is submitted for the limited
24 purpose of establishing probable cause to believe that the defendant committed the crimes
25 set forth herein, this document does not contain all of my knowledge of the larger
26 investigation.

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II. PURPOSE OF AFFIDAVIT

3. This affidavit is made in support of a criminal complaint against JOAO RICARDO DEBORBA (DEBORBA) for eight counts of violations of *Alien Person Prohibited from Possessing a Firearm*, *Possession of Firearms by Person Who is Subject to Domestic Violence Protection Order*, and *Possession of Firearms by a Person Convicted of a Misdemeanor Crime of Domestic Violence*, in violation of Title 18 United States Code Sections 922(g)(5), 922(g)(8), and 922(g)(9).

III. SUMMARY OF PROBABLE CAUSE

DeBorba's Entry to the United States and Citizenship Status

4. In August of 2021, I received information that DEBORBA was arrested for charges involving domestic violence and a violation of a no contact order in Clark County, Washington. This referral stated that DEBORBA was an undocumented immigrant. My review of immigration records indicate that DEBORBA entered the United States on or about November 10, 1999, via the Miami (Florida) International Airport, using a nonimmigrant B2 visitor visa. When entering on that date, DEBORBA provided his Brazilian Passport (no. xxxxx642) stating he was a citizen of Brazil. He was admitted to the United States for a period of up to six months, requiring him to depart the United States on or before May 9, 2000.

5. Based on my investigation of Department of Homeland Security immigration records, there is no record of DEBORBA ever departing the United States or applying for an extension of stay, and it appears he overstayed his visa and is in violation of section 237(a)(1)(B) of the Immigration and Nationality Act. There is also no record in any immigration database of DEBORBA ever receiving permission to legally remain in the United States or any other legal entry at any time after November 10, 1999. I have also obtained a copy of DEBORBA's current Brazilian passport, which states that he was born in Joinville, Santa Catarina, Brazil. and listed him as a national of Brazil. This passport appears to have been issued in Boston, Massachusetts on January 24, 2018, and

1 is due to expire on January 23, 2028. Information from a Brazilian official also confirms
2 this passport is valid and in their system.

3 6. Throughout the investigation I received information from the referral
4 stating that DEBORBA's mother and father are both citizens and nationals of Brazil. I
5 have reviewed DEBORBA's Application for Social Security Card which he listed his
6 father as Antonio DeBorba and his mother as Lidia Lucia Schutza. Based on my
7 investigation of Department of Homeland Security immigration records regarding
8 DEBORBA's parents' information, DEBORBA's mother and father are both listed as
9 citizens and nationals of Brazil and DEBORBA's mother is also known by the name
10 Lidia DeBorba.

11 7. DEBORBA's father entered the United States on or about April 1, 2000, on
12 a B2 visitor visa from Brazil. He overstayed this visa and later departed the United States
13 to Brazil on or about April 20, 2003, using his Brazilian passport. I have learned from
14 Special Agent Scott Jones with the Social Security Administration, Office of Inspector
15 General, that DEBORBA's father also obtained a Social Security Card on or about the
16 same date as DEBORBA, at the Social Security Administration's Ogden, Utah, Field
17 Office. I have reviewed a copy of an application for the original Social Security card
18 submitted by DEBORBA's father in obtaining SSN xxx-xx-1081 using the name Antonio
19 Jaborba instead of DeBorba. The application was signed by DEBORBA's father on
20 January 17, 2001, and stated he was born in Rio Do Sol, Brazil. Under citizenship, it
21 specifies "Legal Alien Not Allowed to Work." The application indicates that, in support
22 of his application, DEBORBA's father provided his Brazilian passport, an I-94 entry
23 document for a B2 visitor visa, and a "DMV" letter. No record of additional legal entries
24 could be located after DEBORBA's father departed the United States on the previously
25 mentioned date.

26 8. DEBORBA's mother last entered the United States on or about January 23,
27 2014, on a B2 visitor visa from Brazil. She then departed the United States to Brazil on or
28 about February 4, 2014, using her Brazilian passport. No valid Social Security number

1 could be located for DEBORBA's mother and there is no record of a United States
2 passport found for either parent.

3 **DeBorba's Social Security Card Application and Claims to U.S. Citizenship**

4 9. I have learned from Special Agent Scott Jones with the Social Security
5 Administration, Office of Inspector General, that DEBORBA was issued Social Security
6 number (SSN) xxx-xx-1075 on January 17, 2001, by the Social Security Administration's
7 Ogden, Utah Field Office. I have reviewed the Application for a Social Security card
8 submitted by DEBORBA in obtaining that Social Security number. The application is
9 signed by DEBORBA, and states he was born in Joinville, Santa Catarina, Brazil. Also,
10 on the "citizenship" question, the box is checked stating that DEBORBA was a "Legal
11 Alien Not Allowed To Work." The application indicates that, in support of this
12 application, DEBORBA provided his previously mentioned Brazilian passport, an I-94
13 entry document for a B2 visitor visa, and a "DMV" letter. There is no record in
14 immigration databases of the I-94 document under the number DEBORBA provided, and
15 I believe it to be a fraudulent document presented in order to obtain a Social Security
16 number. Based on this application, DEBORBA was issued a Social Security number
17 bearing the notation, "NOT VALID FOR EMPLOYMENT." No other replacement card
18 was issued. I believe this Social Security card was most likely issued in order for
19 DEBORBA to obtain state, federal, and/or other benefits, and Special Agent Jones stated
20 it was likely issued in error since a person with a B2 visa is not authorized to work in the
21 United States and such a document is generally not used for establishing eligibility for a
22 Social Security number, nor does a driver's license constitute a valid nonwork reason for
23 assigning a Social Security number.

24 10. I have reviewed an image of DEBORBA's Social Security card. The card
25 bears the notation, "NOT VALID FOR EMPLOYMENT" above the Social Security
26 number, which is over the Social Security Administration seal.

27 11. I have obtained copies of DEBORBA's I-9 Employment Eligibility
28 Verification forms used in connection with his employment with JC Custom Machining

1 & Design, Inc., and A-1 Precision, Inc. On the I-9 form, the applicant is asked to attest,
 2 under penalty of perjury, to his or her citizenship status. On both forms, which bear
 3 DEBORBA's signature, the box is checked next to "A citizen of the United States." The
 4 supporting documentation for the I-9 relating to JC Custom Machining & Design, Inc.
 5 shows DEBORBA submitted a Massachusetts driver's license and a Social Security card
 6 bearing what appears to be Social Security number xxx-xx-1075. Notably, the Social
 7 Security card does not bear the notation "NOT VALID FOR EMPLOYMENT." Further,
 8 the card does not bear the seal of the Social Security Administration, which is the agency
 9 that issues Social Security cards, but rather, it bears the seal of the Department of Health
 10 and Human Services. The supporting documentation for the I-9 form relating to A-1
 11 Precision, Inc. (dated June 10, 2019) shows DEBORBA submitted a Washington driver's
 12 license and another Social Security card bearing SSN xxx-xx-1075 and the seal of the
 13 Social Security Administration, but without the "NOT VALID FOR EMPLOYMENT"
 14 notation. The area of the card where the notation is supposed to be (over the upper
 15 portion of the seal) appears to have been blurred or erased, indicating the card was altered
 16 to remove the "NOT VALID FOR EMPLOYMENT" disclaimer.

17 12. Information provided by Special Agent Mazzuca with the Federal Aviation
 18 Administration revealed that DEBORBA attempted to get a student pilots license in
 19 Massachusetts. On or about March 19, 2014, and April 12, 2015, he stated he was a
 20 citizen of Brazil on official government document FAA Form 8500-8.

21 **DeBorba's Purchases and Possession of Firearms**

22 13. On February 25, 2019, DEBORBA applied for a Concealed Pistol License
 23 in the state of Washington. I have obtained a copy of the Concealed Pistol License
 24 Application signed by DEBORBA, which states that he was born in Joinville, Santa
 25 Catarina Brazil. Next to the question, "Are you a United States citizen?" the box is
 26 checked "Yes." Next to the questions, "Are you a permanent resident alien?" and "Are
 27 you a legal alien temporarily residing in Washington?" the boxes are checked "No." The
 28 space provided on the form for the entry of the applicant's alien registration/I-94 number

1 was left blank. (This CPL was revoked by the Clark County Sheriff's Office on or about
2 November 13, 2020, due to DEBORBA's domestic violence convictions in October
3 2020.)

4 14. I have obtained Bureau of Alcohol, Tobacco, Firearms, and Explosives
5 (ATF) firearms tracing information related to DEBORBA's possession of a number of
6 firearms. According to an ATF Firearms Transaction Record (Form 4473), on March 23,
7 2019, DEBORBA purchased a Savage Arms model M11 rifle from a Sportsman's
8 Warehouse in Portland, Oregon. The Form 4473 bears DEBORBA's signature, and under
9 question 12.a., entitled, "Country of Citizenship," the box next to "United States of
10 America" is checked. The form also provided the answer "No" to questions 12.c. and
11 12.d.1., which read, "Are you an alien illegally or unlawfully in the United States?" and
12 "Are you an alien who has been admitted to the United States under nonimmigrant visa?"
13 In addition, the space that directs an alien to provide their admission number (I-94) was
14 left blank.

15 15. On April 4, 2019, as documented in another Form 4473, DEBORBA
16 purchased a Sig Sauer model 1911 .45 caliber pistol from a Cabela's store in Lacey,
17 Washington. The Form 4473 for the transaction bears DEBORBA's signature, again
18 represents his country of citizenship as the United States of America, provides the answer
19 "No" to the questions about being an alien, and omits DEBORBA's I-94 number.

20 16. On April 13, 2019, as documented in a Form 4473, DEBORBA purchased
21 a KelTec model Sub-2000 .40 caliber rifle from Fast Cash Inc. in Lebanon, Oregon. The
22 Form 4473 for the transaction bears DEBORBA's signature, represents his country of
23 citizenship as the United States of America, provides the answer "No" to the questions
24 about being an alien, and omits DEBORBA's I-94 number.

25 17. On April 14, 2019, DEBORBA was arrested by the Washington State
26 Patrol (WSP) in Vancouver, Washington for Driving Under the Influence. At that time,
27 DEBORBA was in possession of a Glock 26 pistol and his Concealed Pistol License,
28 though he initially denied to the arresting officer that he had a firearm. According to ATF

firearms tracing information, this Glock 26 pistol (serial number BGBU719) was originally sold as a Glock 26 “receiver” (a firearm part) in July 2018 in a sale to a private party. The Form 4473 for this transfer indicates the sale was made by a federally licensed firearms dealer in El Paso, Texas, to a Texas residence, but trace information provides no record of subsequent transfers of the receiver or the assembled firearm made from the receiver. It is unclear at this time how or when DEBORBA obtained the Glock 26 pistol, which is currently in the custody of the WSP.

18. On April 20, 2019, as documented in a Form 4473, DEBORBA purchased a Century Arms model RAS47 7.62 caliber rifle from Keith’s Sporting Goods in Gresham, Oregon. As before, the Form 4473 for the transaction bears DEBORBA’s signature, represents his country of citizenship as the United States of America, provides the answer “No” to the questions about being an alien, and omits DEBORBA’s I-94 number.

19. On May 8, 2019, as documented in a Form 4473, DEBORBA purchased a Rock Island Armory model M200 .38 Special caliber revolver from Brass Tacks Munitions in Vancouver, Washington. Once again, the Form 4473 for the transaction bears DEBORBA’s signature, represents his country of citizenship as the United States of America, provides the answer “No” to the questions about being an alien, and omits DEBORBA’s I-94 number.

Issuance of Domestic Violence No-Contact Orders and Violations of Terms in 2019

20. On November 10, 2019, DEBORBA was arrested in Vancouver, Washington by the Vancouver Police Department (VPD) for assaulting his wife. On November 12, 2019, a Domestic Violence No-Contact Order was issued by the District Court of Washington for the County of Clark, case number 9Z1074494, restraining DEBORBA from, among other things, harassing, stalking, threatening, assaulting, or causing bodily injury to his wife, and prohibiting DEBORBA from possessing any firearms and ordering him to immediately surrender any firearms in his possession. The order was issued in open court with DEBORBA present, and bears his signature

1 acknowledging receipt of the order. On November 14, 2019, a replacement Domestic
 2 Violence No-Contact Order was issued under the same terms, but allowing for third-party
 3 contact between DEBORBA and his wife regarding child visitation and for electronic
 4 communication between DEBORBA and his children. DEBORBA was again present and
 5 acknowledged receiving a copy of the order by signing.

6 21. On or about November 16, 2019, the VPD arrested DEBORBA for
 7 violations of the Domestic Violence No-Contact Order, and, during the arrest, seized
 8 from his residence approximately twenty firearms which he had failed to surrender as
 9 required under the Order, along with other firearm parts and ammunition. These firearms
 10 included the Savage Arms, Sig Sauer , KelTec, Century Arms, and Rock Island Armory
 11 firearms mentioned above, and are currently in the possession of VPD for safekeeping.
 12 Also among the items seized were an AR-15 type rifle along with two AR-15 upper
 13 receivers (firearm parts used to assemble AR-15 type rifles).

14 **Domestic Violence Related Convictions in 2020**

15 22. On October 14, 2020, DEBORBA was convicted of Assault in the Fourth
 16 Degree – Domestic Violence and two counts of Domestic Violence Court Order
 17 Violation in the Superior Court of the State of Washington, County of Clark, in case
 18 number 2020-1-01294-06. The charges alleged a violation of the Domestic Violence No-
 19 Contact Order in case number 9Z1074494, and an assault committed against
 20 DEBORBA's former wife, committed on June 2, 2020, as well as the earlier violation of
 21 the same order on November 16, 2019. Each of these charges were misdemeanors. In
 22 relation to case number 2020-1-01294-06, a new Domestic Violence No Contact Order
 23 was issued, which, among other things, again prohibited DEBORBA from possessing any
 24 firearms and ordered him to immediately surrender any firearms in his possession.
 25 DEBORBA was present and signed the order. The order expires on October 14, 2022.

26 **Evidence of Continued Acquisition or Possession of Firearms**

27 23. In August of 2021 a confidential source (hereinafter "CS-1") provided me
 28 with evidence of DEBORBA operating and firing a firearm, again in violation of the

1 November 14, 2019, Domestic Violence No-Contact Order. The evidence consisted of a
2 video DEBORBA posted on his Instagram social media account with the username
3 rick_sky2020. In this video, DEBORBA appears to be outdoors firing a black rifle with
4 synthetic stock and large optical sight. The video provided appeared to be a recording of
5 the screen of another phone, but due to the focus of the recording, the date, location and
6 account name could not be clearly read. On February 1, 2022, I sought and obtained a
7 federal search warrant for information contained in DEBORBA's Instagram account.
8 Among the items from the Instagram account was a video matching the one shown to me
9 by CS-1, which clearly shows DEBORBA outdoors firing an AR-15 type rifle.
10 Information from the Instagram account indicated that the video was taken on May 20,
11 2020, in Washougal, Washington. This clearly violates the November 14, 2019, Domestic
12 Violence No-Contact Order that DEBORBA signed.

13 24. CS-1 also provided information for DEBORBA's YouTube Channel, titled
14 "joao deborba," where, on March 22, 2019, DEBORBA posted two videos of himself
15 holding and operating a firearm at a firing range. This same source also stated that
16 members of DEBORBA's family have also observed him with firearms since the time
17 VPD seized firearms from him.

18 25. The two YouTube videos were titled, "7mm Brazilian Mauser Atirador de
19 Elite" and "7mm Brazilian Mauser Atirador de Elite 2." I last viewed this page on
20 April 13, 2022, and these videos were still posted. The video titles appear to be a
21 description of the rifle that DEBORBA is depicted firing in the videos, which is a bolt-
22 action rifle with a wood stock. This appears to be consistent with the rifle being
23 Brazilian-made Mauser type rifle chambered for a 7mm cartridge.

24 26. As of March 9, 2022, the videos were accessible on the Internet via the
25 URLs: "https://www.youtube.com/watch?v=L8mTKmYVuso" and
26 "https://www.youtube.com/watch?v=5k4uIKZLXKY."

27 27. On March 14, 2022, I obtained a search warrant for information associated
28 with the above YouTube account. In response to the search warrant, I received from

1 Google LLC (the parent company of YouTube) copies of the two videos I viewed on the
2 YouTube website, as well as metadata associated with the videos indicating that they
3 were created and published on March 23, 2019. Account information indicated that the
4 account subscriber was Joao DeBorba, and that the user of the account has accessed the
5 account using an Android mobile cellular device, which was earliest used to access the
6 account on January 2, 2019, and most recently on March 13, 2022.

7 **Continued Possession of Firearms at Target Premises**

8 28. In April of 2021, police responded to an assault between DEBORBA and
9 his roommates at his residence. At that time, both roommates stated that DEBORBA still
10 had firearms at the residence and that DEBORBA worked for a firearms retailer. These
11 roommates stated that DEBORBA was in possession of a bolt-action rifle. They also
12 stated that he often carried the rifle in a backpack because it could be disassembled, and
13 described it as a black rifle with a synthetic stock, gold barrel, and scope or similar optic.
14 The roommates reported DEBORBA was last seen with the rifle about four weeks prior
15 to the incident.

16 **Domestic Violence-Related Convictions in 2022**

17 29. On January 31, 2022, DEBORBA was again convicted of Assault in the
18 Fourth Degree – Domestic Violence and a Domestic Violence Court Order Violation in
19 the Superior Court of the State of Washington, County of Clark, in case number 21-1-
20 01539-06. The charges alleged a violation of the Domestic Violence No Contact Order
21 issued in case number 20-1-01294-06 and an assault committed against DEBORBA's
22 former wife, occurring on August 22, 2021. Each of the charges were misdemeanors.
23 Pursuant to the judgment, DEBORBA was informed that he may not possess any
24 firearms.

25 **Arrest and Possession of Firearms on May 6, 2022**

26 30. On May 6, 2022, along with other law enforcement agents and officers, I
27 executed a federal search warrant on DEBORBA's residence at 3214 NE 62nd Ave.,
28

1 Apartment J6, Vancouver, Washington. DEBORBA was detained leaving the apartment
2 before law enforcement made entry.

3 31. Inside the residence, law enforcement located five firearms, specifically:
4 two AR-15-type rifles, bearing no serial number or manufacturer's marks; an AR-15-type
5 rifle with an attached bipod, bearing no serial number or manufacturer's marks; a Ruger¹
6 model LCP 9mm caliber handgun, bearing serial number 371726823; and a Glock-type
7 9mm caliber handgun, bearing no serial number or manufacturer's mark.

8 32. Also located inside the apartment was a workbench with a vice, and a large
9 amount of ammunition, firearms parts, firearms tools, what appeared to be a completed
10 firearms silencer or suppressor, suppressor parts, rifle magazines including what appeared
11 to be a 50-round drum magazine, and other firearms accessories including gun and rifle
12 cases.


13 33. Following his arrest, I interviewed DEBORBA, after my partner read him
14 his Miranda rights. DEBORBA agreed to speak to us. During the interview, DEBORBA
15 admitted possessing firearms located in the residence. While my partner and I transported
16 DEBORBA following his arrest, he was shown photos of a number of the firearms
17 located in the residence, and DEBORBA admitted to assembling firearms himself from
18 parts that he purchased through the internet. DEBORBA admitted that he lied on forms
19 he used to purchase firearms, and that he knew that it was illegal for non-citizens to
20 possess firearms.

21 IV. CONCLUSION

22 34. Based on the above facts, I respectfully submit that there is probable cause
23 to believe that JOAO RICARDO DEBORBA did knowingly and intentionally commit
24 the crimes of *Alien Person Prohibited from Possessing a Firearm, Possession of*
25 *Firearms by Person Who is Subject to Domestic Violence Protection Order*, and
26

27
28 ¹ Ruger is a firearms manufacturer based in Southport, Connecticut, with manufacturing facilities in a number of
states outside of Washington.

1 *Possession of Firearms by a Person Convicted of a Misdemeanor Crime of Domestic*
2 *Violence*, in violation of Title 18 United States Code Sections 922(g)(5), 922(g)(8), and
3 922(g)(9).

4
5 
6 Jordan Vossler, Complainant
7 Task Force Officer
8 Federal Bureau of Investigation

9 Based on the Complaint and Affidavit, to which the above-named agent provided
10 a sworn statement attesting to the truth of the contents of such, the Court hereby finds
11 that there is probable cause to believe the Defendant committed the offense set forth in
12 the Complaint.

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14 Dated this 6th day of May, 2022.

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17 The Honorable David W. Christel
18 United States Magistrate Judge
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